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REGULATORY AUTH.

Jim Lamoureux
Senior Attorney
Law and Government Affairs
Southern Region
jlamoureux@att.com

SEP 22 PM 1 01

OFFICE OF THE
EXECUTIVE SECRETARY

Promenade 1
1200 Peachtree Street N.E.
Atlanta, GA 30309
404 810 4196
FAX: 404 810 5901

September 22, 2000

By Hand

David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

Re: Generic Docket to Establish UNE Prices for Line Sharing per FCC 99-355, and Riser
Cable and Terminating Wire as ordered in TRA Docket 98-00123.
Docket No. 00-00544

Dear Mr. Waddell:

Enclosed for filing in the above-captioned proceeding are an original and thirteen copies of the Responses of AT&T Communications of the South Central States, Inc. to the September 8, 2000 data requests from Staff.

If you have questions, please call me.

Sincerely,

Jim Lamoureux

Encls.

POSTED
9-28-00

AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC.
RESPONSE TO TENNESSEE REGULATORY AUTHORITY STAFF DATA
REQUEST DATED SEPTEMBER 8 2000
DOCKET NO. 00-00544

For each Unbundled Network Element (UNE) included in BellSouth's August 18, 2000 filing (relevant pages attached), please answer the following:

Question #1: Is the network element specifically designated for unbundling pursuant to FCC Rule §51.319? If so, please reference the relevant section(s) of the rule, if applicable. Also, indicate if the network element is a Line Sharing Terminating Wire, or Riser Cable element.

Answer: FCC Rule 51.317(a) includes the obligation to unbundle the local loop and subloop. The FCC Rule does not specifically identify any specific "flavors" of local loops or subloops that must be unbundled. Nonetheless, BellSouth rate elements A.5, A.6, A.7, A.8, A.9, A.13, A.14, and A.16 appear to be various forms of local loops BellSouth proposes to offer, and BellSouth rate elements A.2 and A.15 appear to be forms of subloops BellSouth proposes to offer. The FCC unbundling rules do not specifically identify "loop channelization and CO interface" (BellSouth rate element A.3) or "Concentration per system per feature activated" (BellSouth rate element A.12) as UNEs that must be provided by BellSouth. Nonetheless, while AT&T may not agree with the rates or rate structures proposed by BellSouth for these items, AT&T does not object to the consideration of these items in this proceeding. The FCC's unbundling rules also do not identify "Loop conditioning" (BellSouth rate element A.17) or "Loop testing" (BellSouth rate element A.19) as UNEs. AT&T does not agree that it is appropriate for BellSouth to charge any additional amount for these activities and does not agree they should be additional rate elements that BellSouth should be permitted to charge CLECs. Nonetheless, AT&T does not object to the consideration of these issues in this proceeding. FCC Rule 51.317(d) includes the obligation to unbundle interoffice transmission facilities, including dedicated and shared transport and dark fiber. The FCC Rule does not specifically identify any specific "flavors" transport that must be unbundled. Nonetheless, BellSouth rate elements D.5, D.6, D.7, D.8, D.9, and D.12 appear to be various forms of transport BellSouth proposes to offer, and rate element J.1 appears to be BellSouth's rate proposal for access to dark fiber. FCC Rule 51.317(3) includes the obligation to unbundle signaling networks and call related databases. BellSouth rate elements E.3, E.4, E.5, J.5, L.1, M.1 appear to be various databases to which BellSouth proposes to allow CLECs to access. Although BellSouth is required to provide collocation, the FCC's unbundling rule does not specifically identify any of the BellSouth H.3 or H.6 rate elements as UNEs that BellSouth must require. Moreover, it is not entirely clear what the items are that BellSouth is proposing in rate element H.3, it is not clear that the items in

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H.3 are required by or comply with BellSouth's collocation requirements, and, since the TRA already adopted the AT&T/MCI collocation cost model, it is not clear that it is appropriate for BellSouth to submit cost studies for any collocation items. While AT&T agrees that BellSouth is obligated to provide access to loop make-up information (rate element J.3), AT&T disagrees that it is appropriate in a forward looking cost study for BellSouth to charge CLECs for such access. The FCC's unbundling rule does not identify line splitters as UNEs. Nonetheless, AT&T agrees that line splitters must be provided by BellSouth in order to gain access to all of the features and functionality of loops, i.e., the high frequency spectrum of loops over which CLECs may provide advanced services to customers. In addition, AT&T agrees that BellSouth may provide line splitters to CLECs in order to fulfill its line sharing obligation under the FCC's Advanced Services Order. It is unclear to AT&T just what rate element J.5 is, and, at this time, AT&T is unable to determine whether BellSouth is required to provide that item as a UNE under the FCC's unbundling rules or under some other FCC rule.

Question #2: Indicate if the UNE has been included in a cost study submitted as part of TRA Docket Number 97-01262, *In Re: Petition of BellSouth Telecommunications Inc. to Convene a Contested Case to Establish "Permanent Prices" for Interconnection and Unbundled Network Elements*.

Answer: AT&T has not yet completed its review of BellSouth's cost studies. However, it would appear that all of the rate element items are included in BellSouth's cost studies.

Question #3: Indicate if pricing of the UNE is an issue in any pending arbitration before the Authority to which you are a party? If so, please indicate the docket number.

Answer: The pricing of the following UNEs is an issue in the AT&T/BellSouth Arbitration (Docket Number 00-00079) proceeding, and are included in the BellSouth list of rate elements in this proceeding: DS3 dedicated local transport (rate element D.6), dedicated DS3 local channel (D.5.7-9). AT&T also has raised the issue of pricing of "conditioned" loops, which encompasses several of the rate elements in this proceeding (e.g., A.17). In addition, Issues 6 and 7 in the AT&T/BellSouth Arbitration include additional UNEs and combinations of UNEs for which AT&T has requested that the TRA establish prices.